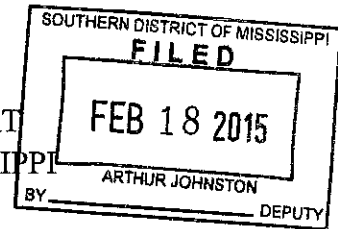


IN THE UNITED STATES DISTRICT COURT
FOR THE SOUTHERN DISTRICT OF MISSISSIPPI
NORTHERN DIVISION



UNITED STATES OF AMERICA

FIRST SUPERSEDING INDICTMENT

v.

CRIMINAL NO.: 3:14cr78TSL-FKB

WILLIAM DAVID DICKSON,
a/k/a Butch Dickson; and
COLBY DICKSON

18 U.S.C. § 371
18 U.S.C. § 152(1)
18 U.S.C. § 152(5)
18 U.S.C. § 1344
18 U.S.C. § 1341
18 U.S.C. § 1956(h)

The Grand Jury Charges:

At all times relevant to this indictment:

1. Community Home Financial Services, Inc. (CHFS) was a privately owned company engaged in the business of mortgage lending and servicing. CHFS's principal place of business was in the Southern District of Mississippi, located at 234 E. Capitol Street, Jackson, Mississippi, until on or about December 20, 2013.
2. The defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, was the President and Director of CHFS.
3. The defendant, **COLBY DICKSON**, was an employee of CHFS.
4. On or about May 23, 2012, CHFS filed for Bankruptcy in the United States Bankruptcy Court for the Southern District of Mississippi, in Chapter 11, Case No. 12-01703-EE. Defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson** signed the Statement and Schedules for CHFS, swearing the information to be true.

5. The Bankruptcy Court exercised its authority over the assets of CHFS, including cash collateral and accounts receivables, and had expressly forbidden the use, expenditure or dissipation of any of the assets of CHFS without prior approval of the Bankruptcy Court.

6. Wells Fargo Bank was a financial institution, the accounts and deposits of which were insured by the Federal Deposit Insurance Corporation. Wells Fargo Bank was an organization whose normal activities took place in interstate and foreign commerce and which had an effect on interstate and foreign commerce.

7. Pursuant to Bankruptcy Court orders, several escrow accounts were held at Wells Fargo for the purpose of collecting and retaining the cash collateral of CHFS, for the benefit of its creditors. The relevant escrow accounts were:

ACCOUNT NAME	FOR THE PURPOSE OF:
CHFS Debtor In Possession operating account (DIP) ending in #9425	Paying court approved expenses of CHFS
EFP funds account ending in #9335	Funds subject to a dispute between CHFS and the Edward Family Partnership
BHT funds account ending in #9343	Funds subject to a dispute between CHFS and the Beher Holdings Trust

8. Banco Panemeno was a financial institution located in the country of Panama.

9. The defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, controlled an account at Banco Panemeno held in the name of the W.W. Warren Foundation.

10. The defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, operated and controlled a company named Victory Consulting Group, Inc. (VCG).

COUNT 1

11. Paragraphs one through ten of this indictment are re-alleged and incorporated herein by reference.

12. Beginning sometime in or around August, 2013, and continuing until in or about May, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson** and **COLBY DICKSON**, did knowing and willfully conspire with each other and with others known and unknown to the Grand Jury, to commit offenses against the United States as follows:

13. Concealment of Bankruptcy Assets in violation of Title 18, United States Code, Section 152(1); and

14. Fraudulently Receiving Property from a Debtor in violation of Title 18, United States Code, Section 152(5).

15. It was part of the conspiracy that the defendants would divert income from the Bankruptcy Trustee in relation to case number 12-01703-EE, styled "In the matter of Community Home Financial Services, Inc, Debtor," by causing mortgagees to send their monthly mortgage payments to addresses in Las Vegas, Nevada and in Miami, Florida instead of to the Bankruptcy Trustee in Jackson, Mississippi. The defendants would arrange for the diverted payments to be shipped to Costa Rica and Panama.

16. Once the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson** endorsed the mortgage payment checks that had been diverted to him in Panama and Costa Roca, he would ship these checks back to the United States, where the defendant **COLBY DICKSON** and others known and unknown to the grand jury, would deposit those payments into bank accounts controlled by the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**.

17. It was also a part of the conspiracy that the defendants would falsely represent to CHFS mortgagees that CHFS was not in bankruptcy, and that all mortgage payments should be

made to CHFS at either the Miami, Florida or Las Vegas, Nevada addresses, or via the CHFS website.

18. It was also a part of the conspiracy that the defendants would file documents with other bankruptcy courts directing those trustees to send payments due to CHFS at the Las Vegas, Nevada address, for the purpose of diverting those funds from the Bankruptcy Trustee in Jackson, Mississippi.

19. It was also a part of the conspiracy that approximately \$9,095,000 held in various escrow accounts at Wells Fargo bank for the benefit of the bankruptcy estate was transferred without the authority of the court to other bank accounts, foreign and domestic, controlled by one or more of the defendants.

20. In furtherance of the conspiracy and to carry out its objectives, the following overt acts were committed:

- a. In or around August, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to begin sending out mortgage statements with payment envelopes addressed to P.O. Box 27740, Las Vegas, Nevada.
- b. In or around December, 2013 the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, established a call center located in Costa Rica to communicate with CHFS mortgagees. The employees of this call center would falsely represent to CHFS mortgagees that CHFS was not in bankruptcy, and that all mortgage payments should be withheld until further notice, mailed to the Miami, Florida or Las Vegas, Nevada addresses, or submitted online at the CHFS website.
- c. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit by U.S. Mail a notice of

creditor change of address with the Office of the Chapter 13 Trustee, in case number 11 B 32313, for the United States Bankruptcy Court for the Northern District of Illinois. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.

d. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit U.S. Mail a notice of creditor change of address with the Office of the Chapter 13 Trustee, in case number 12 B 14678, for the United States Bankruptcy Court for the Northern District of Illinois. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.

e. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit by U.S. Mail a notice of creditor change of address with the Office of the Chapter 13 Trustee, in case number 12 B 27140, for the United States Bankruptcy Court for the Northern District of Illinois. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.

f. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit by U.S. Mail a notice of creditor change of address with the Office of the Chapter 13 Trustee, in case number 13 B 11549, for the United States Bankruptcy Court for the Northern District of Illinois. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.

g. On or about December 16, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit by U.S. Mail a notice of creditor address change with the Office of the Chapter 13 Trustee, in case number 10-64582-PJS, for the United States Bankruptcy Court for the Eastern District of Michigan. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.

h. On or about February 1, 2014, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, submitted a change of address form to the United States Postal Service via the internet, directing that all mail sent to the CHFS office in Jackson, Mississippi be forwarded to 8610 NW 72nd Street, #725, Miami, Florida.

i. In or around February, 2014 the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to begin sending out mortgage statements with payment envelopes addressed to 8610 NW 72nd Street, #725, Miami, Florida.

j. On or about November 5, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$900,000.00 from the DIP operating account to HSBC Bank USA, and then to a Banco Panameno account held in the name of the W.W. Warren Foundation.

k. On or about November 12, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$795,000.00 from the DIP operating account to a Banco Panameno account held in the name of the W.W. Warren Foundation.

l. On or about November 25, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$700,000.00 from the DIP operating account to a Wells Fargo account in the name of VICTORY CONSULTING GROUP, INC. (VCG).

m. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$3,500,000.00 from the EFP escrow account to a Banco Panameno account held in the name of the W.W. Warren Foundation.

n. On or about December 19, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$1,200,000.00 from the DIP operating account to a Banco Panameno account held in the name of the W.W. Warren Foundation.

o. On or about December 20, 2013, the defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to relocate its principal place of business from Jackson, Mississippi to Panama.

p. On or about January 6, 2014, the defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused approximately \$450,000.00 to be transferred via wire from a VCG Wells Fargo account to a Banco Panameno account held in the name of the W.W. Warren Foundation.

q. On or about January 6, 2014, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, left the United States and traveled to San Jose, Costa Rica.

r. On or about January 13, 2014, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson** and COMMUNITY HOME FINANCIAL SERVICES, INC. entered into an equipment lease to acquire payment processing machines.

s. On or about February 10, 2014, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, corresponded with a CHFS mortgagee, and provided tax and payment history information to the customer via email.

t. On or about February 17, 2014, a CHFS mortgagee received a demand letter for an alleged past due mortgage payment from the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, directing the mortgagee to send the payment to 8610 NW 72nd Street, #725, Miami, Florida.

u. On or about February 20, 2014, an individual known to the grand jury, via email address briannichol13@aol.com, directed a CHFS mortgagee to send their mortgage payment to 8610 NW 72nd Street, #725, Miami, Florida.

v. From in or about January, 2014, and continuing to in or about March, 2014, the defendants, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson** and **COLBY DICKSON**, would cause the transfer via common carrier and the United States mails, of payments from CHFS mortgagees, from Costa Rica and Panama to Jackson, Mississippi, and would cause those payments to be deposited into bank accounts controlled by the defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, for the purpose of concealing those funds from the Bankruptcy Trustee. All in violation of Sections 371 and 2, Title 18, United States Code.

COUNTS 2-7

21. Paragraphs one through twenty of this indictment are re-alleged and incorporated herein by reference.

22. On or about the dates listed below, in Hinds County in the Northern Division of the Southern District of Mississippi, the defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, knowingly and fraudulently received from CHFS, Debtor, in the case filed May 23, 2012, under Title 11 of the United States Code and styled "In the matter of Community Home Financial Services, Inc., Debtor," Bankruptcy Docket No. 12-01703-EE, a material amount of property, that is approximately \$9,095,000 held in various bankruptcy escrow accounts, with intent to defeat the provisions of Title 11.

COUNT	DATE	APPROXIMATE AMOUNT	FROM	TO ACCOUNT
2	11/5/2013	\$900,000.00	CHFS DIP	W.W. Warren at Banco Panemeno
3	11/12/2013	\$795,500.00	CHFS DIP	W.W. Warren at Banco Panemeno
4	11/25/2013	\$700,000.00	CHFS DIP	VCG Wells Fargo
5	12/11/2013	\$3,500,000.00	EFP Escrow	W.W. Warren at Banco Panemeno
6	12/11/2013	\$2,000,000.00	BHT Escrow	W.W. Warren at Banco Panemeno
7	12/19/2013	\$1,200,000.00	CHFS DIP	W.W. Warren at Banco Panemeno

All in violation of Sections 152(5) and 2, Title 18, United States Code.

COUNTS 8-13

23. Paragraphs one through twenty-two of this indictment are re-alleged and incorporated herein by reference.

24. On or about the dates listed below, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendant, **WILLIAM DAVID**

DICKSON, a/k/a Butch Dickson, aided and abetted by others known and unknown to the grand jury, knowingly devised and executed a scheme and artifice to obtain funds under the custody or control of Wells Fargo Bank by means of materially false and fraudulent pretenses and representations, with intent to defraud the United States Bankruptcy Court for the Southern District of Mississippi and Wells Fargo Bank; to wit, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson** would fraudulently cause funds to be transferred from Wells Fargo Bank to an account controlled by the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson** and held at Banco Panemeno, by directing Wells Fargo to conduct the following wire transfers, in order to conceal the location of the funds held in the three (3) escrow accounts described *supra* in paragraph seven (7), into the bank account he controlled at Banco Panemeno.

COUNT	DATE	APPROXIMATE AMOUNT	FROM	TO ACCOUNT
8	11/5/2013	\$900,000.00	CHFS DIP	W.W. Warren at Banco Panemeno
9	11/12/2013	\$795,500.00	CHFS DIP	W.W. Warren at Banco Panemeno
10	11/25/2013	\$700,000.00	CHFS DIP	VCG Wells Fargo
11	12/11/2013	\$3,500,000.00	EFP Escrow	W.W. Warren at Banco Panemeno
12	12/11/2013	\$2,000,000.00	BHT Escrow	W.W. Warren at Banco Panemeno
13	12/19/2013	\$1,200,000.00	CHFS DIP	W.W. Warren at Banco Panemeno

All in violation of Sections 1344 and 2, of Title 18 United States Code.

COUNTS 14-18

25. Paragraphs one through twenty-four of this indictment are re-alleged and incorporated herein by reference.

26. On or about the dates listed below, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants, **WILLIAM DAVID**

DICKSON, a/k/a Butch Dickson and COLBY DICKSON, aided and abetted by others known and unknown to the grand jury, devised a scheme and artifice to defraud and to obtain money or property by means of false and fraudulent pretenses and representations. It was part of the scheme and artifice that the defendants would divert income from the Bankruptcy Trustee in relation to case number 12-01703-EE, styled "In the matter of Community Home Financial Services, Inc, Debtor," by causing mortgagees to send their monthly mortgage payments to addresses in Las Vegas, Nevada and in Miami, Florida instead of to the Bankruptcy Trustee in Jackson, Mississippi. The defendants would arrange for the diverted payments to be shipped to Costa Rica.

27. It was also a part of the scheme and artifice that the defendants would falsely represent to CHFS mortgagees that CHFS was not in bankruptcy, and that all mortgage payments should be made to CHFS at either the Miami, Florida or Las Vegas, Nevada addresses, or via the CHFS website.

28. It was also a part of the scheme and artifice that the defendants would file documents with other bankruptcy courts directing those trustees to send payments due to CHFS at either the Las Vegas or Miami addresses, for the purpose of diverting those funds from the Bankruptcy Trustee in Jackson, Mississippi.

29. Having devised the scheme and artifice to defraud described above, for the purpose of executing and attempting to execute the scheme, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson and COLBY DICKSON**, did knowingly and unlawfully cause to be delivered, on or about the dates set forth below, by mail matters according to the directions thereon to the persons and entities described below, the following matter:

COUNT	DATE	MAILING
14	12/11/2013	Change of Creditor Address mailed to U.S. Trustee in the Northern District of Illinois in reference to case number 12 B 14678.
15	12/11/2013	Change of Creditor Address mailed to U.S. Trustee in the Northern District of Illinois in reference to case number 12 B 27140.
16	12/11/2013	Change of Creditor Address mailed to U.S. Trustee in the Northern District of Illinois in reference to case number 13 B 11549.
17	12/16/2013	Notice of Creditor Address Change mailed to U.S. Trustee in the Eastern District of Michigan in reference to case number 10-64582-PJS.
18	2/17/2014	Letter mailed to a CHFS mortgagee demanding payment to 8610 NW 72 nd Street, #725, Miami, Florida.

All in violation of Sections 1341 and 2, Title 18, United States Code.

COUNT 19

30. Paragraphs one through twenty-nine of this indictment are re-alleged and incorporated herein by reference.

31. Beginning sometime in or around August, 2013, and continuing until in or around May, 2014, in Hinds County, in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson and COLBY DICKSON**, did knowingly combine, conspire, and agree with other persons known and unknown to the Grand Jury to commit offenses against the United States in violation of Section 1956, Title 18, United States Code, to wit:

32. To knowingly conduct and attempt to conduct financial transactions affecting interstate commerce and foreign commerce, which transactions involved property represented by a law enforcement officer to be the proceeds of specified unlawful activity, that is, possession with the intent to distribute a controlled substance, knowing that the transactions were designed in whole or in part to conceal and disguise the nature, location, source, ownership, and control of

the property believed to be the proceeds of specified unlawful activity, and that while conducting and attempting to conduct such financial transactions, believed that the property involved in the financial transactions represented the proceeds of some form of unlawful activity, in violation of Section 1956(a)(3)(B), Title 18, United States Code.

33. The manner and means used to accomplish the objectives of the conspiracy included, among others, the following:

- a. In or around August, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to begin sending out mortgage statements with payment envelopes addressed to P.O. Box 27740, Las Vegas, Nevada.
- b. In or around December, 2013 the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, established a call center located in Costa Rica to communicate with CHFS mortgagees. The employees of this call center would falsely represent to CHFS mortgagees that CHFS was not in bankruptcy, and that all mortgage payments should be withheld until further notice, mailed to the Miami, Florida or Las Vegas, Nevada addresses, or submitted online at the CHFS website.
- c. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit by U.S. Mail a notice of creditor change of address with the Office of the Chapter 13 Trustee, in case number 11 B 32313, for the United States Bankruptcy Court for the Northern District of Illinois. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.

- d. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit U.S. Mail a notice of creditor change of address with the Office of the Chapter 13 Trustee, in case number 12 B 14678, for the United States Bankruptcy Court for the Northern District of Illinois. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.
- e. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit by U.S. Mail a notice of creditor change of address with the Office of the Chapter 13 Trustee, in case number 12 B 27140, for the United States Bankruptcy Court for the Northern District of Illinois. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.
- f. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit by U.S. Mail a notice of creditor change of address with the Office of the Chapter 13 Trustee, in case number 13 B 11549, for the United States Bankruptcy Court for the Northern District of Illinois. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.
- g. On or about December 16, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to submit by U.S. Mail a notice of creditor address change with the Office of the Chapter 13 Trustee, in case number 10-64582-PJS, for the United States Bankruptcy Court for the Eastern District of

Michigan. This creditor change of address instructed the Trustee to send all payments made to CHFS to P.O. Box 27740, Las Vegas, Nevada.

- h. On or about February 1, 2014, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, submitted a change of address form to the United States Postal Service via the internet, directing that all mail sent to the CHFS office in Jackson, Mississippi be forwarded to 8610 NW 72nd Street, #725, Miami, Florida.
- i. In or around February, 2014 the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to begin sending out mortgage statements with payment envelopes addressed to 8610 NW 72nd Street, #725, Miami, Florida.
- j. On or about November 5, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$900,000.00 from the DIP operating account to HSBC Bank USA, and then to a Banco Panameno account held in the name of the W.W. Warren Foundation.
- k. On or about November 12, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$795,000.00 from the DIP operating account to a Banco Panameno account held in the name of the W.W. Warren Foundation.
- l. On or about November 25, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$700,000.00 from the DIP operating account to a Wells Fargo account in the name of VICTORY CONSULTING GROUP, INC. (VCG).

- m. On or about December 11, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$3,500,000.00 from the EFP escrow account to a Banco Panameno account held in the name of the W.W. Warren Foundation.
- n. On or about December 19, 2013, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused Wells Fargo Bank to transfer via wire approximately \$1,200,000.00 from the DIP operating account to a Banco Panameno account held in the name of the W.W. Warren Foundation.
- o. On or about December 20, 2013, the defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused CHFS to relocate its principal place of business from Jackson, Mississippi to Panama.
- p. On or about January 6, 2014, the defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, caused approximately \$450,000.00 to be transferred via wire from a VCG Wells Fargo account to a Banco Panameno account held in the name of the W.W. Warren Foundation.
- q. On or about January 6, 2014, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, left the United States and traveled to San Jose, Costa Rica.
- r. On or about January 13, 2014, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson** and COMMUNITY HOME FINANCIAL SERVICES, INC. entered into an equipment lease to acquire payment processing machines.
- s. On or about February 10, 2014, the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, corresponded with a CHFS mortgagee, and provided tax and payment history information to the customer via email.

- t. On or about February 17, 2014, a CHFS mortgagee received a demand letter for an alleged past due mortgage payment from the defendant **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, directing the mortgagee to send the payment to 8610 NW 72nd Street, #725, Miami, Florida.
- u. On or about February 20, 2014, an individual known to the grand jury, via email address briannichol13@aol.com, directed a CHFS mortgagee to send their mortgage payment to 8610 NW 72nd Street, #725, Miami, Florida.
- v. From in or about January, 2014, and continuing to in or about March, 2014, the defendants, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson and COLBY DICKSON**, would cause the transfer via common carrier and the United States mails, of payments from CHFS mortgagees, from Costa Rica and Panama to Jackson, Mississippi, and would cause those payments to be deposited into bank accounts controlled by the defendant, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson**, for the purpose of concealing those funds from the Bankruptcy Trustee.

All in violation of Section 1956(h) and 2, Title 18, United States Code.

COUNTS 20-25

34. Paragraphs one through thirty-four of this indictment are re-alleged and incorporated herein by reference.

35. On or about the dates listed below, in Hinds County in the Northern Division of the Southern District of Mississippi and elsewhere, the defendants, **WILLIAM DAVID DICKSON, a/k/a Butch Dickson and COLBY DICKSON**, aided and abetted by others known and unknown to the grand jury, knowingly and fraudulently conceal property belonging to

CHFS, Docket No. 12-01703-EE, from the trustee charged with control of the debtor's property and from the creditors and the United States Trustee.

COUNT	CHECK DATE	DATE POSTED	PAYEE	ACCOUNT DEPOSITED INTO
20	2/6/2014	3/7/2014	Community Home Financial Service, Inc.	OmniBank Account #22484, held in the name of W.D. Dickson Enterprises Inc.
21	2/4/2014	3/7/2014	Community Home	OmniBank Account #22484, held in the name of W.D. Dickson Enterprises Inc.
22	2/3/2014	3/7/2014	Community Home Financial Services, Inc.	OmniBank Account #22484, held in the name of W.D. Dickson Enterprises Inc.
23	2/2/2014	3/7/2014	Community Home Financial	OmniBank Account #22484, held in the name of W.D. Dickson Enterprises Inc.
24	2/3/2014	3/7/2014	Community Home Financial	OmniBank Account #22484, held in the name of W.D. Dickson Enterprises Inc.
25	2/7/14	3/7/2014	Community Home Financial	OmniBank Account #22484, held in the name of W.D. Dickson Enterprises Inc.

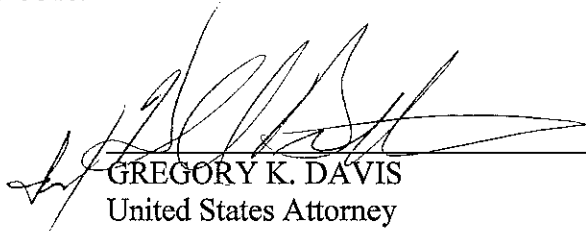
All in violation of Sections 152(1) and 2, Title 18 United States Code.

NOTICE OF INTENT TO SEEK CRIMINAL FORFEITURE

36. As a result of committing the offenses alleged in this Indictment, the defendants shall forfeit to the United States all property involved in or traceable to property involved in the offenses, including but not limited to all proceeds obtained directly or indirectly from the offenses, and all property used to facilitate the offenses. Further, if any property described above, as a result of any act or omission of the defendants: (a) cannot be located upon the exercise of due diligence; (b) has been transferred or sold to, or deposited with, a third party; (c) has been placed beyond the jurisdiction of the Court; (d) has been substantially diminished in value; or (e)

has been commingled with other property, which cannot be divided without difficulty, then it is the intent of the United States to seek a judgment of forfeiture of any other property of the defendants, up to the value of the property described in this notice or any bill of particulars supporting it.

All pursuant to Sections 981(a)(1)(C) and 982(a)(2), Title 18, United States Code and Section 2461, Title 28, United States Code.


GREGORY K. DAVIS
United States Attorney

A TRUE BILL:

Foreperson of the Grand Jury

This indictment was returned in open court by the foreperson or deputy foreperson of the grand jury on this the 18th day of February 2015.


UNITED STATES MAGISTRATE JUDGE